

Friday – March 14, 2014 – 9:00am Conference Room 329

The House Committee on Health

- To: Representative Della Au Belatti, Chair Representative Dee Morikawa, Vice Chair
- From: George Greene President & CEO Healthcare Association of Hawaii

Re: Testimony in Support SB 2577, SD 2 — Relating to Naturopathic Physicians

The Healthcare Association of Hawaii (HAH) is a 116-member organization that includes all of the acute care hospitals in Hawaii, the majority of long term care facilities, all the Medicare-certified home health agencies, all hospice programs, as well as other healthcare organizations including durable medical equipment, air and ground ambulance, blood bank and respiratory therapy. In addition to providing quality care to all of Hawaii's residents, our members contribute significantly to Hawaii's economy by employing nearly 20,000 people statewide.

Thank you for the opportunity to testify in support of SB 2577, SD 2, which requires naturopathic practitioners to fulfill the same education, examination, and training requirements as other physicians to qualify for prescription privileges. Requiring naturopathic physicians to meet these requirements would promote patient safety, and would ensure that Hawaii's residents receive the highest quality of care possible.

HAH is committed to working with providers across the continuum of care toward a healthcare system that offers the best possible quality of care to the residents of the state, and SB 2577, SD 2 would be a positive contribution toward that goal.

Thank you for the opportunity to testify in support of SB 2577, SD 2.



HAWAII MEDICAL ASSOCIATION 1360 S. Beretania Street, Suite 200, Honolulu, Hawaii 96814 Phone (808) 536-7702 Fax (808) 528-2376 www.hmaonline.net

DATE:Friday, March 14, 2014TIME:9:00 AMPLACE:Conference Room 329

TO: <u>COMMITTEE ON HEALTH</u> Rep. Della Au Belatti, Chair Rep. Dee Morikawa, Vice Chair

FROM: Hawaii Medical Association Dr. Walton Shim, MD, President Dr. Linda Rasmussen, MD, Legislative Co-Chair Dr. Ron Kienitz, DO, Legislative Co-Chair Dr. Christopher Flanders, DO, Executive Director Lauren Zirbel, Community and Government Relations

Re: SB 2277, SD 2 RELATING TO NATUROPATHIC PHYSICIANS

Position: Support SB 2277, SD1

We would like to express stronger support for the SD1 of this bill because we believe that scope of practice should be in line with the education of the provider. The ACA mandates that insurers now provide payment based on State Scope of Practice. Prior to the impending implementation of this part of the ACA, ND's were not reimbursed by HMSA. This is due to a lack of clinical evidence about the efficacy of this type of medicine. We must take a serious look at this particular scope of practice statue and keep in mind the importance of protecting the public. The current scope of practice act for ND's allows their board to offer a formulary which allows ND's with very little pharmacological training to prescribe very powerful and dangerous drugs, which, in some cases, only MD and DO specialists would prescribe.

We urge the committee to consider the issue on the basis of the safety of Hawaii patients. HMA would appreciate a board viewing the Naturopathic formulary to be in line with formularies for other states and the level of supervision in other states. HMA understands that its support of this legislation, as well as its opposition to parts of the 2009 legislation, has been misinterpreted. Despite the fact that to some it may appear at first glance to be divisive, we are compelled to show support based on the principle of consumer protection.

Officers President - Walton Shim, MD President-Elect – Robert Sloan, MD Secretary - Thomas Kosasa, MD Immediate Past President – Stephen Kemble, MD Treasurer – Brandon Lee, MD Executive Director – Christopher Flanders, DO Naturopathic medicine may be an option for some citizens of our state, and our support of this bill is not intended to be an assault on naturopathic philosophy, nor an attempt to prevent the ability of a patient to choose natural therapies, should they desire. The HMA supports allowing naturopaths to practice natural medicine, as they were trained, with utilization conventional medications only as determined by a multi-disciplinary board to be safely within their scope of education and training.

Naturopathic education differs from that received within allopathic (MDs) or osteopathic (DOs) medical schools, and has, by philosophy, fewer standards and requirements for training in in the use of allopathic/osteopathic treatment modalities. Naturopathic education focuses primarily on natural treatments. Few contact hours of study on pharmacological treatment of disease are received, and provide <u>virtually no clinical reinforcement of pharmaceutical</u> <u>intervention for patients in a clinical setting</u>. On page 26 of the attached document you can review the credits required for graduation from all naturopathic medical schools. The document reveals that only 7-11 credits of Pharmacology are required for graduation and that <u>no</u> <u>residency is required.</u>

Newly graduated MDs/DOs enter into a residency program that is three to seven years or more of professional training under the supervision of senior physician educators. The length of residency training depends on the medical specialty chosen: family practice, internal medicine, and pediatrics, for example, require 3 years of training; general surgery and Obstetrics/Gynecology require 5 years.

It is important to consider whether this limited exposure to pharmaceuticals allows for safe use of the strong medications listed on the current naturopathic formulary. The list includes **psychoactive agents, cardiovascular and respiratory drugs, medical gas**, many of which can have unpredictable effects on patients. Years of study and working experience are required for MDs and DOs to gain the familiarity and knowledge to deal with the complex medical problems these drugs treat, and to quickly recognize and treat adverse outcomes. The naturopathic board as it currently exists does not have the necessary expertise to review these matters.

There are 33 states that do not even license naturopaths. Some expressly prohibit naturopathy or have repealed naturopathic provisions. Of the 17 states who do license naturopaths, most have continuing education requirements, limited formularies, physician supervision, and a multi-disciplinary board. Oregon has a MD on the Naturopathic board. In California, the naturopathic formulary advisory subcommittee is composed of an equal number of representatives from the clinical and academic settings of physicians and surgeons, pharmacists, and naturopathic doctors.

Hawaii requires continuing education for physicians, and advanced practice nurses with prescriptive authority, but does not for naturopaths.

The concern for patient safety is even more critical in light of the public confusion regarding qualifications of non-physician health care practitioners, such as naturopaths. It is also important to note that Medicare and Medicaid in Hawaii do not reimburse for naturopathic services, nor do many of Hawaii's health plans, although this will soon change due to the fact that the scope of practice in each state requires mandatory coverage under the ACA. Health plans are still assessing the impact and ultimate outcome of this mandate on patient safety and rates. This means that now more than ever, our state should take a hard look at the scope of practice allowed under our existing naturopathic board which is comprised of 3 naturopaths and 2 members of the public. Expanding the naturopathic scope of practice cannot adequately address access to care for the majority of Hawaii's population and in many cases has caused harm due to drug interactions and other high-risk medical situations.

In order for physicians to receive payment from insurance they must have \$1 million/ \$3 million liability insurance, be subject to data collection regarding outcomes and quality of treatment, and meet quality metrics. This is not the case for ND's currently, but the HMA feels it should be given the current scope of practice, and would suggest this amendment.

Please find an attached review of educational training for your information.

Thank you for the opportunity to submit testimony on this important issue.

If you are interested in reviewing California's ND statute please find it here:

California NDs

Continuing education required for licensure

60 credit hours biennially. **At least 20 being in pharmacotherapeutics**. (Cal. Bus. & Prof. Code, Ch. 8.2 § 3635)

Scope of Practice

(Cal. Bus. & Prof. Code, Ch. 8.2 § 3640 - § 3643)

...A naturopathic doctor may order diagnostic imaging studies, including X-ray, ultrasound, mammogram, bone densitometry, and others, consistent with naturopathic training as determined by the bureau, **but shall refer the studies to an appropriately licensed health care professional** to conduct the study and interpret the results...Repair and care incidental to superficial lacerations and abrasions, **except suturing**.

Rx Authority

(Cal. Bus. & Prof. Code, Ch. 8.2 § 3627)

Licensed California naturopaths may prescribe drugs or products contained in the Naturopathic formulary. As of October 2006, a Formulary Advisory Committee has been established, and is currently meeting, but has not yet produced a naturopathic formulary. **Drugs can be furnished**

by a naturopathic doctor "in accordance with standardized procedures or protocols developed by the naturopathic doctor and his or her supervising physician and surgeon." The furnishing and ordering of such drugs must occur under physician and surgeon supervision, may include Schedule III through Schedule V controlled substances, and may be further limited to those drugs specified in the standardized procedure between the naturopathic doctor and physician and surgeon.

3627. (a) The committee shall establish a naturopathic formulary advisory subcommittee to determine a naturopathic formulary based upon a review of naturopathic medical education and training.

(b) The naturopathic formulary advisory subcommittee shall be composed of an equal number of representatives from the clinical and academic settings of physicians and surgeons, pharmacists, and naturopathic doctors.

(c) The naturopathic formulary advisory subcommittee shall review naturopathic education, training, and practice and make specific recommendations regarding the prescribing, ordering, and furnishing authority of a naturopathic doctor and the required supervision and protocols for those functions.

(d) The committee shall make recommendations to the Legislature not later than January 1, 2007, regarding the prescribing and furnishing authority of a naturopathic doctor and the required supervision and protocols, including those for the utilization of intravenous and ocular routes of prescription drug administration.

The naturopathic formulary advisory subcommittee and the committee shall consult with physicians and surgeons, pharmacists, and licensed naturopathic doctors in developing the findings and recommendations submitted to the Legislature.

3640.5. Nothing in this chapter or any other provision of law shall be construed to prohibit a naturopathic doctor from furnishing or ordering drugs when all of the following apply:

(a) The drugs are furnished or ordered by a naturopathic doctor in accordance with standardized procedures or protocols developed by the naturopathic doctor and his or her supervising physician and surgeon.

(b) The naturopathic doctor is functioning pursuant to standardized procedure, as defined by subdivisions (a), (b), (d), (e), (h), and (i) of Section 2836.1 and paragraph (1) of subdivision (c) of Section 2836.1, or protocol. The standardized procedure or protocol shall be developed and approved by the supervising physician and surgeon, the naturopathic doctor, and, where applicable, the facility administrator or his or her designee.

(c) The standardized procedure or protocol covering the furnishing of drugs shall specify which naturopathic doctors may furnish or order drugs, which drugs may be furnished or ordered under what circumstances, the extent of physician and surgeon supervision, the method of periodic review of the naturopathic doctor's competence, including peer review, and review of the provisions of the standardized procedure.

(d) The furnishing or ordering of drugs by a naturopathic doctor occurs under physician and surgeon supervision. Physician and surgeon supervision shall not be construed to require the physical presence of the physician, but does include all of the following:

(1) Collaboration on the development of the standardized procedure.

(2) Approval of the standardized procedure.

(3) Availability by telephonic contact at the time of patient examination by the naturopathic doctor.

(e) For purposes of this section, a physician and surgeon shall not supervise more than four naturopathic doctors at one time.

(f) Drugs furnished or ordered by a naturopathic doctor may include Schedule III through Schedule V controlled substances under the California Uniform Controlled Substances Act (Division 10 (commencing with Section 11000) of the Health and Safety Code) and shall be further limited to those drugs agreed upon by the naturopathic doctor and physician and surgeon as specified in the standardized procedure. When Schedule III controlled substances, as defined in Section 11056 of the Health and Safety Code, are furnished or ordered by a naturopathic doctor, the controlled substances shall be furnished or ordered in accordance with a patient-specific protocol approved by the treating or supervising physician. A copy of the section of the naturopathic doctor's standardized procedure relating to controlled substances shall be provided upon request, to a licensed pharmacist who dispenses drugs, when there is uncertainty about the naturopathic doctor furnishing the order.

(g) The committee has certified that the naturopathic doctor has satisfactorily completed adequate coursework in pharmacology covering the drugs to be furnished or ordered under this section. The committee shall establish the requirements for satisfactory completion of this subdivision.

(h) Use of the term "furnishing" in this section, in health facilities defined in subdivisions (b), (c), (d), (e), and (i) of Section 1250 of the Health and Safety Code, shall include both of the following:

(1) Ordering a drug in accordance with the standardized procedure.

(2) Transmitting an order of a supervising physician and surgeon.

(i) For purposes of this section, "drug order" or "order" means an order for medication which is dispensed to or for an ultimate user, issued by a naturopathic doctor as an individual practitioner, within the meaning of Section 1306.02 of Title 21 of the Code of Federal Regulations.

(j) Notwithstanding any other provision of law, the following apply:

(1) A drug order issued pursuant to this section shall be treated in the same manner as a prescription of the supervising physician.

(2) All references to prescription in this code and the Health and Safety Code shall include drug orders issued by naturopathic doctors.

(3) The signature of a naturopathic doctor on a drug order issued in accordance with this section shall be deemed to be the signature of a prescriber for purposes of this code and the Health and Safety Code.

PRESENTATION OF THE BOARD OF NATUROPATHIC MEDICINE

TO THE HOUSE COMMITTEE ON HEALTH

TWENTY-SEVENTH LEGISLATURE Regular Session of 2014

Friday, March 14, 2014 9:00 a.m.

TESTIMONY ON SENATE BILL NO. 2577, S.D. 2, RELATING TO NATUROPATHIC PHYSICIANS.

TO THE HONORABLE DELLA AU BELATTI, CHAIR, AND MEMBERS OF THE COMMITTEE:

My name is Dr. Kevin Gibson, Chairperson of the Board of Naturopathic Medicine ("Board"). The Board appreciates the opportunity to provide testimony on Senate Bill. No. 2577, S.D. 2, relating to Naturopathic Physicians. This bill proposes to require naturopathic physicians to complete a minimum of thirty-five total hours of continuing education courses, of which includes a minimum of fifteen hours in pharmacology, during each licensing renewal biennium, beginning December 31, 2017.

While the Board recognizes the value of continuing education ("CE") and supports the intent of CE requirements for naturopathic physicians as a condition of licensure, it has not had an opportunity to meet and discuss the number of hours of CE courses that would be appropriate at each biennial renewal period. This matter will be discussed at the next Board meeting which is scheduled for today at 2:00 p.m.

Thank you for the opportunity to provide testimony on Senate Bill No. 2577, S.D. 2.

morikawa2-Joanna

From:	steelsmith@hawaii.rr.com		
Sent:	Wednesday, March 12, 2014 9:43 PM		
То:	HLTtestimony		
Subject:	Support for SB2577 SD2		

March 12, 2014

From: Alex Steelsmith 438 Hobron Lane, Suite 314 Honolulu, HI 96815

To: Representative Della Au Belatti, Chair, Representative Dee Morikawa, Vice Chair, and Members of the House Committee on Health, at: HLTtestimony@capitol.hawaii.gov

Testimony Position: Support for SB2577 SD2 Relating to Naturopathic Physicians (bill scheduled to be heard by HLT on Friday, March 14, at 9:00 am in House conference room 329)

Dear Representative Della Au Belatti, Representative Dee Morikawa, and Other Distinguished Members of the Committee,

Having followed the progress of SB2577 closely, I'd like to thank Senator Baker and the Senate Committee on Commerce and Consumer Protection for shaping this bill into its current form. Like the overwhelming majority of those who provided written testimonies, I found its previous versions to be extremely objectionable. The Hawaii Legislature website shows that the first version of this bill received approximately 315 email testimonies from people opposed to it, and only three in favor. The second version, SB2577 SD1, was even more unpopular, receiving approximately 880 emails in opposition and only one in support.

However, the current version of this bill, SB2577 SD2, has wisely removed all of the objectionable features and preserved the only appropriate and sensible component. Many naturopathic doctors already fulfill ample continuing education credits, and many have voluntarily proposed that they be required for all naturopathic physicians. By supporting naturopathic doctors in their need to establish formal continuing education requirements, SB2577 SD2 will further ensure their ability to practice according to the high standards of their training.

This bill has been transformed from a harmful and regressive piece of legislation - one that would have required naturopathic doctors to inappropriately limit their practices in order to retain prescription rights they have already earned - into one that will actually assist them in their efforts to serve the public. By supporting their ability to provide the highest level of naturopathic health care, it will benefit the people of Hawaii.

Sincerely, Alex Steelsmith

morikawa2-Joanna

From: Sent: To: Subject: Laurie Steelsmith <lauriesteelsmith@gmail.com> Wednesday, March 12, 2014 9:36 PM HLTtestimony Support for SB2577 SD2 relating to naturopathic physicians.

From: Dr. Laurie Steelsmith, N.D., L.Ac. Steelsmith Natural Health Center 438 Hobron Lane, Suite 314 Honolulu, HI 96815

To: Representative Della Au Belatti, Chair, Representative Dee Morikawa, Vice Chair, and Members of the House Committee on Health

Testimony Position: Support for SB2577 SD2 Relating to Naturopathic Physicians (bill scheduled to be heard by HLT on Friday, March 14, at 9:00 am in House conference room 329)

Dear Honorable Representative Della Au Belatti, Honorable Representative Dee Morikawa, and Other Distinguished Members of the Committee,

I'm writing to voice my support for SB2577 SD2 relating to naturopathic physicians. This bill as it now stands, in its newly amended version, is a good idea that would put Hawaii's naturopathic law on par with the laws in many other states regarding continuing education requirements for naturopathic doctors.

I have held naturopathic licenses in the state of Hawaii and the state of Washington for over 20 years, and practiced naturopathic medicine in Hawaii since 1993. Naturopathic doctors are thoroughly trained physicians who practice according to rigorous standards of education taught at accredited naturopathic medical schools. In order to have a naturopathic medical license, we are required to pass national board exams, recognized by the State of Hawaii, which cover the full scope of our training. This bill would only add further assurance that the people of Hawaii are continuing to receive the high level of naturopathic health care that they deserve.

The Hawaii Society of Naturopathic Physicians endorses this bill, and our Board recommends that all naturopathic physicians in Hawaii receive continuing education credits, including credits in pharmacology. Many naturopathic physicians already voluntarily receive the amounts of continuing education credits that this bill requires. Thank you for considering my testimony in support of SB2577 SD2.

Sincerely, Dr. Laurie Steelsmith, N.D., L.Ac. Medical Director and Supervising Physician, Steelsmith Natural Health Center

morikawa2-Joanna

From:	Kristen Coles <kristencolesnd@gmail.com></kristencolesnd@gmail.com>
Sent:	Wednesday, March 12, 2014 9:44 PM
To:	HLTtestimony
Subject:	Support SB2577 SD2

From: Kristen Coles, N.D., L.Ac. Steelsmith Natural Health Center 438 Hobron Lane, Suite 314 Honolulu, HI 96815

To: Representative Della Au Belatti, Chair, Representative Dee Morikawa, Vice Chair, and Members of the House Committee on Health

Testimony Position: Support for SB2577 SD2 Relating to Naturopathic Physicians (bill scheduled to be heard by HLT on Friday, March 14, at 9:00 am in House conference room 329)

Dear Honorable Representative Della Au Belatti, Honorable Representative Dee Morikawa, and Other Distinguished Members of the Committee,

I'm writing to voice my support for SB2577 SD2 relating to naturopathic physicians. This bill, in its newly amended version, is beneficial for the citizens of Hawaii and for the Naturopathic Doctors practicing in Hawaii.

I am a practicing naturopathic physician in the state of Hawaii and I believe that continuing education requirements are something that should be included in our licensure in order to keep Hawaii on par with the other states that license naturopathic physicians.

The Hawaii Society of Naturopathic Physicians endorses this bill, and our Board recommends that all naturopathic physicians in Hawaii receive continuing education credits, including credits in pharmacology. Many naturopathic physicians already voluntarily receive the amounts of continuing education credits that this bill requires. Thank you for considering my testimony in support of SB2577 SD2.

Sincerely, Dr. Kristen Coles Steelsmith Natural Health Center

From:	mailinglist@capitol.hawaii.gov
Sent:	Wednesday, March 12, 2014 9:28 PM
То:	HLTtestimony
Cc:	doctordarrow@gmail.com
Subject:	*Submitted testimony for SB2577 on Mar 14, 2014 09:00AM*
Subject:	Submitted testimony for SB2577 on Mar 14, 2014 09.00AM

SB2577

Submitted on: 3/12/2014 Testimony for HLT on Mar 14, 2014 09:00AM in Conference Room 329

Submitted By	Organization	Testifier Position	Present at Hearing
Darrow Hand	Individual	Support	No

Comments:

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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House Committee Health Chair Della Au Belatti, Vice Chair Dee Morikawa and Committee Members

RE: SB 2577 SD2 Relating to Naturopathic Physicians

Hearing Date: March 14, 2014 Time: 9:00 AM Place: Room 329

My name is Wade Wolfe and I live and work on the Big Island of Hawaii. I am a graduate of U.H. Hilo and am currently completing my final semester of graduate school at U.H. Manoa. I am a long time patient and supporter of Naturopathic Physicians. My son and I are wonderful examples of the effectiveness of Naturopathic Physicians and medicine.

I am testifying on SB 2577 SD2 and respectfully ask that you OPPOSE this bill in its current form.

Naturopathic physicians were granted prescriptive authority in 2009. To date, there has not been any cases of harm (regarding naturopathic physicians that pertain to the prescription of medications) reported to the Regulated Industries Complaint Office, the Board of Naturopathic Medicine, nor has there been any lawsuits filed in this regard.

Naturopathic physicians are an invaluable part of healthcare throughout our state and are uniquely qualified to collaborate with other health care professionals in providing extremely effective complimentary care. By unreasonably restricting naturopathic physicians from practicing according to their training, SB2577 SD2 would have many negative consequences on the overall quality of health care in Hawaii. It would drastically reduce our naturopathic physicians' capacity to effectively serve the public, and limit Hawaii's ability to attract top-quality naturopathic physicians. Please allow our naturopathic physicians to practice as trained, and allow me to continue receiving high quality naturopathic care.

Naturopathic physicians receive ample training at nationally accredited naturopathic medical schools, including the same basic sciences taught in conventional medical schools, such as standard methods of physical, clinical, and laboratory diagnosis. They are trained in therapies given by injection, and highly qualified to safely prescribe medications. SB2577 SD2 would hinder their ability to practice according to their training, and according to standards that have long been upheld in other states

In conclusion, further regulation of Naturopathic Physicians is unnecessary when considering the relevant statistical data, unscathed safety record, and strong support of Naturopathic Medicine in the state of Hawaii. SB 2577 SD2 would essentially require naturopathic physicians to limit or give up prescription rights that are essential to their services.

Mahalo for the opportunity to submit my testimony in opposition to SB 2577 SD2.

Wade Wolfe Individual Testimony 808 937-7413

From: Sent:	mailinglist@capitol.hawaii.gov Thursday, March 13, 2014 4:11 PM
To:	HLTtestimony
Cc:	littlelongon@yahoo.com
Subject:	Submitted testimony for SB2577 on Mar 14, 2014 09:00AM



SB2577

Submitted on: 3/13/2014 Testimony for HLT on Mar 14, 2014 09:00AM in Conference Room 329

Submitted By	Organization	Testifier Position	Present at Hearing
Miles Greenberg	Individual	Support	No

Comments: I am a full time practicing naturopathic physician in Hawaii for about 25 years. I am in support of continuing education, including pharmacy hours as described in the current language of this bill. Thank you for your support of SB 2577

Please note that testimony submitted less than 24 hours prior to the hearing, improperly identified, or directed to the incorrect office, may not be posted online or distributed to the committee prior to the convening of the public hearing.

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Hawaii House of Representatives Committee on Health Conference Room 329, March 14, 2014 9:00 AM

Testimony re: SB 2577 SD2

Chairperson Rep. Della Au Belatti, Vice Chairperson Rep. Dee Morikawa, and Members of the Committee:

I support this bill, as it represents an opportunity to strengthen the naturopathic profession in Hawaii.

Thank you,

Sincerely,

Jack Burke, ND, LAc.



Dr. Kathryn Taketa-Wong, N.D., L.Ac. Naturopathic Physician Licensed Acupuncturist



March 14, 2014

Dear Honorable Chair Belatti, Vice Chair Morikawa and Representatives of the House Committees on Health, Consumer Protection & Commerce, and Judiciary:

Re: IN SUPPORT OF SB 2577 SD2

I am a naturopathic physician practicing here in Hawaii. I am in support of SB2577 SD2 which makes continuing education a requirement for Hawaii licensed naturopathic physicians. Although continuing education has to date not been required for NDs in Hawaii, most of my naturopathic colleagues and I still complete continuing education on a regular basis to keep current with advances in medicine. Each year I fly to the mainland for at least one 3-day medical conference on my specialty of autism and pediatric developmental disorders. The Hawaii Society of Naturopathic Physicians has tried in years past to legislatively require CE for our profession, but this has been repeatedly denied citing a 1987 Auditor's report finding that CE was unnecessary. The Hawaii Medical Association has used the lack of the CE requirement to attack our profession in the past, which has been frustrating to the majority of us who are completing CE on a regular basis even without the requirement. **Please SUPPORT SB2577 SD2**. Mahalo nui loa!

Sincerely,

Kathryn Taketa-Wong, N.D., L.Ac. Naturopathic Physician Medical Academy of Pediatric Special Needs Fellowship Candidate